



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

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July 30, 1998

James Shaffer, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Draft Restoration Advisory Board Meeting Notes, Naval Education and Training Center, Newport, Rhode Island

The Office has reviewed the draft copy of the Restoration Advisory Board meeting notes dated 22 July 1998. Attached are comments generated as a result of this review. The Office recommends that black and white copies of both the Navy's and State's photographs be included in the meeting notes. If the Navy has any questions concerning the above, please contact this Office at (401) 222-2797 ext 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa, Project Manager
Office of Waste Management

cc: Warren S. Angell, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, USEPA
Mellissia Griffen, NETC

**Comments on the Draft
Restoration Advisory Board Meeting Notes
Dated July 15, 1998**

1. Page 2, First Paragraph.

Please note in this section of the notes that at each stop, the State passed out photographs of the sites and gave a brief presentation.

2. Page 3, First Paragraph.

Please note that the State indicated that disposal of soil contaminated with lead, PCBs, petroleum and asbestos at a RCRA subtitle C Landfill would cost between \$200-300 per cubic yard. In an effort to reduce cost the State recommended that the soils be stabilized with concrete. This would allow the soils to be disposed of as a non RCRA waste. In addition, the State recommended that the soils be shipped to McAllister Point Landfill.

Please include the States discussion of the removal action in the northern end of the site. In this action the Navy base removed approximately 800 cubic yards of PCB and petroleum contaminated soils. However, the problem was greater than originally anticipated and contaminated soils were left behind when funds ran out. Photos provided by the State depicted soils saturated with petroleum immediately below surface soils that did not appear to be contaminated.

3. Page 5, First Paragraph.

The State passed out photographs depicting the clean up of the oil water separator at the site. The State also noted that investigations conducted under the State's program have revealed that contaminated surface soil, and groundwater is present at different tanks in the site.

4. Page 6, Third Paragraph.

Please note the following:

Inspections of the tanks and the results of the chip sampling had revealed that cleaning efforts were successful in certain areas and not in others.

Reballasting with water would allow for the leaching of the oil from tanks so that it could be dealt with if necessary at a latter date.

The Navy was given the option to either reclean the tanks or acknowledge that contamination was left behind which would require a more intensive monitoring program. The Navy chose the latter.

5. Page 6, Last Paragraph.

Please note that the State passed out photographs of the site when it was active and discussed the operations conducted at the site. The State also provided photographs depicting contaminated soils unearth during test pitting activities.

6. Page 7, Third Paragraph.

Please note that the State indicated that the concentrations of lead reported by the Navy would exceed Rhode Department of Health Standards.

7. Page 8, First Paragraph.

Please note that the State provided paragraphs depicting the site and hazardous waste storage areas.

"RIDEM thinks there are some additional storage areas that are suspect so the Navy has agreed to revisit them as funding is available."

Please modify the above as follows: The State has noted that the Screening Site Assessment Report did not investigate hazardous waste storage areas and other potentially contaminated areas which were identified in early studies. The Navy has agreed to investigate these areas, as funding becomes available.

8. Page 8, Fourth Paragraph.

Please note that the State provided photograph of the site when it was operational (photographs depict the filling in of the bay). As depicted by the photographs a beach developed at the base of the landfill in what was formerly open waters, the depth of the water at the base of the landfill may have been as deep ten feet. Representative photos were also provided of contaminated soil and groundwater observed during cap construction.